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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZLATKO IANKULOV,

Defendants.

Case No. 2:02-cr-650-GMN-VCF

**Motion to Dismiss the Indictment and  
Quash Arrest Warrant for Defendant  
Iankulov**

On or about August 13, 2002, Iankulov was charged in a scheme relating to his alleged arranging of fraudulent marriages for purposes to evade immigration laws by way of a Fourth Superseding Indictment. ECF 127, case number 2:02-CR-12-MMD-PAL. On or about December 10, 2002, a federal grand jury indicted Iankulov for Failure to Appear in the marriage fraud matter in violation of Title 18 United States Code, Section 3146(a)(1). ECF 1. Investigation into Iankulov's whereabouts is unknown but it is believed that he is a fugitive residing in a country that does not have an extradition agreement with the United States. On or about April 17, 2019, the charges against Iankulov in case number 2:02-CR-12-MMD-PAL was dismissed at the government's request and the warrant for Iankulov's arrest was quashed. ECF 299, case number 2:02-CR-12-MMD-PAL.

1 Pursuant to Federal Rule of Criminal Procedure 48(a), the Government now  
2 requests permission of the Court to dismiss the Indictment charging Iankulov for failing to  
3 appear, ECF 1. If granted, because the defendant would no longer face any charges in this  
4 case, the Government further requests that the Court quash the outstanding warrant for  
5 Iankulov's arrest.

6 Respectfully submitted this 10th day of June, 2021.

7 CHRISTOPHER CHIOU  
8 Acting United States Attorney  
District of Nevada

9 /s/ Kimberly M. Frayn  
10 KIMBERLY M. FRAYN  
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZLATKO IANKULOV,

Defendants.

Case No. 2:02-cr-650-GMN-VCF

**[Proposed] Order Granting the Motion  
to Dismiss the Indictment and Quash  
Arrest Warrant for Defendant Iankulov**

Pursuant to Federal Rule of Criminal Procedure 48(a), and upon leave of Court, the  
United States hereby dismisses the Indictment against Defendant Iankulov.

CHRISTOPHER CHIOU  
Acting United States Attorney  
District of Nevada

/s/ Kimberly M. Frayn  
KIMBERLY M. FRAYN  
Assistant United States Attorney

Leave of Court is granted for the filing of the above dismissal. Because the  
Indictment has been dismissed as to Defendant Iankulov, it is hereby ordered that the  
warrants for his arrest, issued December 10, 2002, is quashed.

DATED this 11 day of June, 2021.

  
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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT